

FEDERAL MAIL SERVICE

**WILLIAMS NATURAL GAS COMPANY**

POST OFFICE BOX 3288 — TULSA, OKLAHOMA 74101

HOWARD E. JANZEN  
VICE PRESIDENT  
OPERATIONS

April 14, 1992

OFFICE RECEIVED

FILE

APR 21 1992

Ms. Donna R. Searcy, Secretary  
Federal Communications Commission  
1919 "M" Street, N.W., Room 222  
Washington, D.C. 20554

Federal Communications Commission  
Office of the Secretary

RE: Notice of Proposed Rule Making  
Docket No. 92-9

Dear Ms. Searcy:

Williams Natural Gas Company hereby submits its comments regarding the Federal Communications Commission's PCS Notice of Proposed Rule Making - Docket No. 92-9.

Scope of Existing Infrastructure

Williams Natural Gas Company operates a 9,800-mile natural gas pipeline system with mainline delivery capacity of 2.4 Bcfd. The System, which accesses natural gas from fields in Kansas, Oklahoma, Colorado, Texas and Wyoming, provides transportation and sales service to customers in seven mid-continent states: Kansas, Oklahoma, Colorado, Texas, Wyoming, Nebraska and Missouri.

Williams Natural Gas Company also operates a communication system, which includes 38 paths of licensed 1850-2200 MHz band microwave channels ranging in distance from 8 miles to 45.2 miles, with average path length of 21.5 miles. Estimated total, undepreciated investment in this microwave facility is \$8.8 million.

Potential Impact

Williams Natural Gas Company opposes the proposed reallocation of spectrum in the 1850-2200 MHz band for the development of Personal Communications Networks (PCN). If Williams Natural Gas Company was no longer permitted to operate in this band, this would cause a loss of 68% of WNG's private operational fixed microwave system used for voice traffic, and for a supervisory control and data acquisition system (SCADA) that is essential to the safe and efficient operation of its high-pressure natural gas pipeline network. This SCADA system is fundamental to the unmanned operation of main line gas compressor stations. Reallocation or replacement of the spectrum by common carrier circuits would certainly result in reduced reliability, for WNG. Lack of suitable frequencies in other private microwave bands would also make replacement of 68% of WNG's microwave radios questionable. If WNG was no longer able to use the 1850-2200 MHz band, it is estimated the total cost of engineering, installation, site acquisition, equipment, etc., to install replacement facilities or obtain substitute service would run in excess of \$8 million with an estimated transition to alternate facilities or services of 2-4 years.

No. of Copies rec'd 0

List A B C D E

Comments of Proposed Rule Making-Docket No. 92-9:

## Proposal (1):

To allow existing facilities to remain co-primary with new services for some period of time (10 or 15 years).

## Comment (1):

WNG would prefer to see an indefinite transition period, where the existing facilities remain co-primary with new services for an indefinite period of time.

## Proposal (2):

To adopt a phased approach in which specific blocks of spectrum would be made available for new services over time.

## Comment (2):

This appeals to WNG if the specific blocks of spectrum are in the lightly loaded government 2 GHz range, and the new emerging innovative technologies utilize this spectrum. This seems to be the most efficient use of the spectrum as the new services are in a design mode at this time anyway, and this would eliminate the required reaccommodation of existing fixed system.

## Proposal (3):

To allow parties seeking to operate new services to negotiate financial agreements with existing users for access to these frequencies during a transition period.

## Comment (3):

See comment (1) concerning transition period. To allow negotiation of financial agreements should be acceptable to all parties, if the existing facilities are not required to "make a deal" due to a restrictive transition period.

## Proposal (4):

To continue indefinitely the authority of state and local government licensees to operate their existing fixed microwave facilities on a primary basis.

## Comment (4):

This should be afforded all users and not just state and local government licensees, as the cost to replace equipment is just as much for non-governmental licensees as for governmental licensees. All industries would face special economic and operational considerations in relocating their 2 GHz fixed microwave operations to higher frequencies or alternative media. A natural gas company's communications' system is just as much a public safety issue as disruption of police, fire and other public safety communications.

## Proposal (5):

For new fixed microwave operations to be authorized on the subject frequencies only on a secondary basis.

## Comment (5):

WNG would be opposed to this in that the expansion of facilities would be hindered if this were the case. Let the economy and need determine the users basis whether primary or secondary, rather than dictating who will and who will not be primary and secondary users. There is no provision in the proposed rule making to state how modification to existing 2 GHz facilities will be handled, WNG assumes that equipment could be upgraded and antennas replaced (what is now considered major modifications) without the danger of losing existing primary status.

## Proposal (6):

Whether tax certificates can and should be granted to fixed microwave licensees who receive financial compensation as part of an agreement to surrender their license and use other, non-radio alternative media.

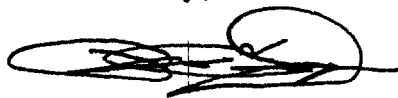
## Comment (6):

Tax breaks should be allowed for microwave licensees who receive financial compensation as part of an agreement to surrender their license and use other, non-radio alternative media or radio alternatives.

General Comments and Conclusions

In a presentation at the 1992 Entelec Technical Program in Dallas, Texas by Associated Communications of Los Angeles on "Frequency Management of PCS service to co-exist with microwave," it was stated that there should be no reason why PCS service could not co-exist with existing microwave users and if interference problems arise the new PCS service would cease operation until the problems were resolved. This seems to be a fair statement by the new technology PCS service groups. I see no reason to disagree with this statement. This is the way frequency coordination has been handled for decades and there is no reason to believe it needs to be fixed at this time.

Sincerely,

A handwritten signature in black ink, appearing to be a stylized name, possibly "WNG", with a large circular flourish at the end.